

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DONALD MICHAEL OUTLAW,
Plaintiff,

v.

CITY OF PHILADELPHIA, et al.,
Defendants.

:
:
:
:
:
:
:
:
:
:

**Civil Action
No. 21-1290**

JURY TRIAL DEMANDED

**DEFENDANTS' REPLY IN FURTHER SUPPORT OF THEIR MOTION FOR
EXTENSION OF TIME TO SERVE REBUTTAL EXPERT REPORTS AND TO FILE
DAUBERT AND SUMMARY JUDGMENT MOTIONS**

Defendants reply in support of their motion for an extension of time only to highlight to the Court that the motion is unopposed, inasmuch as Plaintiff's "Partial Opposition" does not oppose the relief sought. See Pl.'s Opp. 1 (ECF No. 73). Accordingly, Defendants have not further reviewed, nor need the Court consider, Plaintiff's 20-page brief or 51 pages of exhibits to dispose of the instant motion. Defendants do not concede any apparently needless arguments or factual representations made in Plaintiff's oppositions. Likewise, Defendants acknowledge that Plaintiff's non-opposition does not constitute an agreement with the representations or arguments contained in Defendant's motion. For the reasons stated in Defendants' initial motion papers, and because Defendants' relief is unopposed, Defendants respectfully ask the Court grant the extension consistent with the proposed order, or such other relief as the Court deems just.

Dated: September 22, 2022

Respectfully submitted,

/s/ Danielle B. Rosenthal

Danielle B. Rosenthal
Deputy City Solicitor
PA Bar No. 329676
City of Philadelphia Law Department
1515 Arch Street, 14th Floor

Philadelphia, PA 19102
(215) 683-5448
danielle.rosenthal@phila.gov

/s/ Katelyn Mays
Katelyn Mays
Assistant City Solicitor
Pa. Attorney ID No. 324246
City of Philadelphia Law Department
1515 Arch Street, 14th Floor
Philadelphia, PA 19102
(215) 683-5434
katelyn.mays@phila.gov

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DONALD MICHAEL OUTLAW,
Plaintiff,

v.

CITY OF PHILADELPHIA, et al.,
Defendants.

:
:
:
:
:
:
:
:
:
:

**Civil Action
No. 21-1290**

JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

I hereby certify that on the date below Defendants' Reply Brief in Further Support of Their Motion for Extension of Time to Serve Rebuttal Expert Reports and to File *Daubert* and Summary Judgment Motions was filed electronically and is available to all counsel of record.

September 22, 2022

/s/ Katelyn Mays

Katelyn Mays
Assistant City Solicitor
Pa. Attorney ID No. 324246
City of Philadelphia Law Department
1515 Arch Street, 14th Floor
Philadelphia, PA 19102
(215) 683-5434
katelyn.mays@phila.gov